

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
JOEL ABRAHAM THEODORE : CHAPTER 13
Debtor. :

MOREQUITY INC. :
Movant, :
:
vs. :
JOEL ABRAHAM THEODORE : CASE NO. 5-17-02669
Respondents. :

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362**

AND NOW COMES, Joel Abraham Theodore, the Debtor, and files an Answer to MorEquity Inc.'s Motion for Relief From the Automatic Stay:

1. Joel Abraham Theodore (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Movant alleges that Debtor has failed to make post-petition mortgage payments.
3. Debtors Counsel is in the process of contacting the Debtor to ascertain if the payments have been made or if the Debtor is in the possession of the funds needed to cure the alleged default.
4. Movant is not entitled to relief from the automatic stay as the arrearage amount due has been paid or shall be paid through the Chapter 13 Plan, and/or a six (6) month Stipulation, and, therefore, the Movant is adequately protected.

WHEREFORE, the Debtor respectfully requests that Movant's Motion for Relief from the Automatic Stay be denied.

Respectfully submitted,

Date: November 13, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire
PA ID# 59887
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(570) 347-7764

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 13, 2017, he caused a true and correct copy of Debtor's Answer to MorEquity Inc.'s Motion for Relief from the Automatic Stay to be served Via First Class United States Mail, Postage Pre-paid in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at dehartstaff@ramapo.com

James Warmbrodt, Esq. at jwarmbrodt@kmlawgroup.com

Dated: November 13, 2017

/s/Tullio DeLuca
Tullio DeLuca, Esquire